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PROPOSED ATTORNEYS FOR DEBTORS

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re: § Chapter 11
§
ERG Intermediate Holdings, LLC, *et al.*,¹ § Jointly Administered
§
Debtors. § Case No.: 15-31858-hdh-11

NOTICE OF HEARING

PLEASE TAKE NOTICE that on May 1, 2015 the above-captioned debtors (the "Debtors") filed, among other items, the following motions in connection with these chapter 11 cases:

- a) Motion of the Debtors for Interim and Final Orders Establishing Adequate Assurance Procedures Pursuant to Section 366 of the Bankruptcy Code (the "Utilities Motion") [Docket No. 10];
- b) Motion of the Debtors for an Order Authorizing Them to Pay Certain Prepetition Taxes (the "Tax Motion") [Docket No. 13]; and
- c) Motion of the Debtors for an Order (I) Authorizing Them to Pay Certain Prepetition Obligations on Account of Royalties, Overriding Royalty Interests, Working Interest Owner Payments and Severance Taxes and (II) Authorizing Banks to Honor and

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (8385). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309. The above addresses are listed solely for the purposes of notices and communications.

Process Related Checks and Electronic Transfers (the "Royalty Motion", and together with the Utilities Motion and the Tax Motion, the "Motions") [Docket No. 14]

PLEASE TAKE FURTHER NOTICE, that the Utilities Motion contains a proposal to deposit, in a segregated account, an amount approximately equal to two weeks of the Debtors' obligations to Utility Companies (as defined in the Utilities Motion) for the payment of postpetition obligations owed to Utility Companies. The Debtors intend for this deposit, to occur within 20 days of the commencement of these chapter 11 cases, and as described in the Utilities Motion, to constitute the Debtors' furnishment of adequate assurance of payment within the meaning of 11 U.S.C. § 366.

PLEASE TAKE FURTHER NOTICE, that on **May 6, 2015** the Court entered an order granting certain of the relief with regard to severance taxes and royalties in Texas sought pursuant to the Royalty Motion [Docket No. 51].

PLEASE TAKE FURTHER NOTICE, that a hearing to consider the relief requested in the Motions, to include the remaining relief with regard to California royalties requested in the Royalty Motion, will be held before the Honorable Judge Harlin D. Hale, United States Bankruptcy Judge, at the United States Bankruptcy Court, 1100 Commerce Street, 14th Floor, Courtroom #3, Dallas, TX 75242-1496 on **May 22, 2015 at 10:30 a.m. (CDT)**, or at such other time as the court may determine.

PLEASE TAKE FURTHER NOTICE that any objections or other responses (collectively, "Objections") must be filed on or before **May 18, 2015 at 5:00 p.m. (CDT)** (the "Objection Deadline") with the Clerk of the Bankruptcy Court for the Northern District of Texas (the "Clerk's Office"), Earle Cabell Federal Building, 1100 Commerce St., Rm. 1254, Dallas, TX 75242-1496. At the same time, you must serve a copy of the Objection upon the following parties so as to be received on or before the Objection Deadline: (a) the Debtors,

c/o ERG Resources, L.L.C., 333 Clay Street, Suite 4400, Houston, TX 77002 (Attn: Kelly Plato);
(b) Debtors' counsel, (i) Jones Day, 717 Texas Avenue, Suite 3300, Houston, Texas 77002
(Attn: Thomas Howley) and (ii) Jones Day, 77 West Wacker, Suite 3500, Chicago, Illinois
60601 (Attn: Joe Florczak); (c) counsel to the Debtors' lenders, White & Case LLP, 633 West
Fifth Street, Suite 1900, Los Angeles, California 90071 (Attn: Roberto Kampfner); (d) the U.S.
Trustee, Earle Cabell Federal Building, 1100 Commerce Street, Room 976, Dallas, TX 75242;
and (e) once it is formed, counsel to the official committee of unsecured creditors.

Dated: May 7, 2015
Dallas, Texas

Respectfully submitted,

/s/ Tom A. Howley
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